

Exhibit C to Ferber Declaration
Part 2

1 ANTONNE M. JONES

2 A That's who I can recall at this
3 moment.

4 Q What else was discussed during this
5 phone conversation?

6 A That's pretty much what I can recall
7 at this moment.

8 Q Is there anything that would help you
9 recall more about that phone conversation?

10 A Not at this -- I'm not sure at this
11 moment.

12 Q What was the next contact that you had
13 with Mr. Anderson?

14 A Another contact -- I'm not sure if it
15 was right after that, but another contact, I had
16 met him at his mother's house.

17 Q And how long after the phone call was
18 this meeting?

19 A I'm not sure. I would say
20 approximately a week or two.

21 Q Where does his mother live?

22 A On Elsworth Street on -- I believe
23 it's the 2500 block of Elsworth.

24 Q What's her name?

25 A Oh, I don't know her name. It was

ANTONNE M. JONES

outside of his mother's house. He was sitting in the car. It was in front of his mother's door.

Q How did you come to meet him?

A I drove.

Q How did you know that he would be there?

A He called me to let me know where he was going to be at.

Q Did you discuss anything else on that phone call?

A Well, we discussed the purpose of me meeting him, which was I was giving him a copy of my new book, the Lex Street Massacre.

Q And why did he want a copy of the book?

A Because it just came out and it was -- at the time, it was pretty popular.

Q Did he call you asking you to come by and bring a copy of the book?

A I'm not sure at this moment who called who.

Q On this phone conversation, did you discuss anything else with Mr. Anderson?

1 ANTONNE M. JONES

2 A Not that I could recall at this
3 moment.

4 Q Did you take any notes of any of your
5 phone conversations with Mr. Andersen?

6 A No, I didn't take any notes.

7 Q Do you have any notes as to any of the
8 meetings with Mr. Anderson?

9 A No, I didn't take any notes.

10 Q Was anybody else present at the first
11 meeting that you had with Mr. Anderson?

12 A No, he was home alone.

13 Q And what about the meeting outside his
14 mother's house, was anybody else present?

15 A He was in his car. We both sat in his
16 car, and his mother came up and also his
17 brother, Monty came by, walked up to the car.

18 Q Were they part of the conversation you
19 had with Mr. Anderson?

20 A No, they were not actually part the
21 conversation. They just came up, and his mother
22 spoke to both of us and went across the street.

23 Q What did she say?

24 A I'm not sure exactly what she said.

25 Q Do you recall generally what she said?

1 ANTONNE M. JONES

2 A No, I can't recall at this moment.

3 Q What else did you discuss with
4 Mr. Anderson during this meeting?

5 A He told me about -- that he was -- he
6 was really talking about personal stuff about
7 his divorce and that he was planning on going
8 out to Los Angeles and the problems he was
9 having, physical problems.

10 Q What else did you two discuss?

11 A That's all I could recall at this
12 moment.

13 Q Why was he discussing these things
14 with you?

15 MR. DUNLOP: Objection as to form.

16 A I imagine he thought I was a good
17 listener.

18 Q Do you recall anything else about the
19 meeting with Mr. Anderson outside his mother's
20 house?

21 A Well, he also talked about he had a
22 new Cadillac and he was talking about the new
23 Cadillac he had. He also mentioned how he was
24 tired of chasing Mr. Dash down and complaining
25 about what he didn't receive.

1 ANTONNE M. JONES

2 Q What did he -- what else did he say
3 about that?

4 A It was pretty much the same
5 information, there's a lack of compensation.

6 Q For State Property?

7 A I believe so, yes.

8 Q What else was discussed relating to
9 State Property?

10 A That's all I could recall at this
11 moment.

12 Q Did you talk about Mr. Anderson having
13 written State Property?

14 A No, I didn't. I don't recall.

15 Q Did you talk about the claims made in
16 your complaint that State Property was based on
17 your book?

18 A Yes, I did.

19 Q And what did you say about that?

20 A That it was just that. That it was
21 based off of my book.

22 Q And what was his response to that?

23 A To the best of my understanding, there
24 was no response.

25 MR. FERBER: Please read back the last

1 ANTONNE M. JONES

2 two questions and answers.

3 (Whereupon, the requested portion was
4 read back by the court reporter.)

5 BY MR. TAMOSHUNAS:

6 Q What was the next thing that was said
7 during that conversation?

8 A I don't recall at this moment the
9 entire conversation.

10 Q Did Mr. Anderson ever disagree with
11 the claims that you made in the complaint --

12 MR. DUNLOP: Objection as to form.

13 BY MR. TAMOSHUNAS:

14 Q -- that State Property is based on
15 your book?

16 A I don't recall at this time. I don't
17 recall.

18 Q Did you discuss whether he had ever
19 read your book, The Family?

20 A Not that I could recall at this
21 moment.

22 Q Do you recall anything else regarding
23 your meeting with Mr. Anderson outside his
24 mother's house?

25 A At this moment, no, I don't recall

1 ANTONNE M. JONES

2 anything else.

3 Q What was your next contact with
4 Mr. Anderson, if any?

5 A He called me again. He called me
6 again.

7 Q And when was that?

8 A I don't remember exactly. It was
9 approximately, probably maybe a week or two
10 afterwards.

11 Q And what did he say?

12 A He just was asking me, you know, what
13 was going on with the lawsuit and again, some
14 personal stuff he was talking about.

15 Q And what did you tell him about what
16 was going on with the lawsuit?

17 A Basically, there wasn't much to talk
18 about. Basically that it was filed. That was
19 pretty much it.

20 Q Did you say anything at all about the
21 lawsuit?

22 A I don't recall at this moment.

23 Q What else did Mr. Anderson say during
24 this conversation?

25 A Other than the personal information, I

1 ANTONNE M. JONES

2 don't recall anything else at this moment.

3 Q What personal information did he talk
4 about?

5 A Personal information was with his
6 situation going through with his wife and his
7 daughter or his kids. I think maybe his
8 daughter. I'm not sure how many he has. He was
9 speaking about his wife, the situation he was
10 going through with his wife and, you know, he
11 was talking about his kids, that he takes them
12 to school and different things like that.

13 Q What else did he say during this
14 conversation?

15 A That's all I can recall at this
16 moment.

17 Q Did you talk to anybody or E-mail
18 anybody regarding your conversations with
19 Mr. Anderson?

20 A Not that I can recall.

21 Q What was your next contact with
22 Mr. Anderson?

23 A I can't recall the next conversation
24 at this moment.

25 Q Do you recall if you ever spoke to

1 ANTONNE M. JONES

2 Mr. Anderson after that?

3 A I'm not sure like how many times we
4 talk, but we did speak again afterwards.

5 Q When was that?

6 A Mr. Anderson, there was another time
7 he was coming from Las Vegas to Philadelphia.

8 Q Mr. Anderson --

9 A He was out in Las Vegas and he was
10 coming to Philadelphia.

11 Q When was this?

12 A I don't remember the exact time and
13 date.

14 Q Do you remember the approximate date?

15 A No, I don't recall at this moment.

16 Q It was this year though, right?

17 A Yes, it was this year.

18 Q Do you recall who initiated the phone
19 call?

20 A The way I remember it, it was
21 Mr. Anderson who gave me the call.

22 Q What did he say?

23 A He was calling to let me know he was
24 coming to town.

25 Q What did you say in response to that?

1 ANTONNE M. JONES

2 A We were just talking basically about
3 what he was doing out in Vegas.

4 Q What did he say about what he was
5 doing?

6 A He was just trying -- basically, he
7 was doing some kind of business and he was kind
8 of stressed out about the situation with his
9 wife.

10 Q What kind of business was he doing out
11 in Las Vegas?

12 A I'm not really sure what business.

13 Q What did he say about his business in
14 Las Vegas?

15 A I don't recall at this moment. It was
16 kind of like, well, not brief but he kept it
17 like he was taking care of business out in Las
18 Vegas.

19 Q What was your understanding as to what
20 he was doing out in Las Vegas?

21 A I have no understanding other than he
22 was telling me that he was out taking care of
23 business.

24 Q Did he say anything else about it at
25 all?

1 ANTONNE M. JONES

2 A Not that I could remember at this
3 moment.

4 Q What else did he say during this
5 conversation?

6 A During the conversation he mentioned,
7 I think, that he had to move or something. It
8 was some personal things in nature.

9 Q Why did he have to move?

10 A My understanding is the situation with
11 his wife, they were getting divorced and they
12 were splitting the house or something.

13 Q What else did he talk about during
14 this conversation?

15 A That's all I can recall at this
16 moment.

17 Q Did you talk about the lawsuit?

18 A I don't believe so.

19 Q Did you talk about State Property?

20 A At this moment, I don't believe so.

21 Q Did you talk about your book, the
22 Family?

23 A Again, this moment, I don't recall.

24 Q Do you recall any other conversations
25 or meetings with Mr. Anderson?

1 ANTONNE M. JONES

2 A At this moment, no, I don't recall any
3 other conversations.

4 Q When was the first time you became
5 aware of State Property?

6 A Became aware?

7 Q Yes.

8 A In what regard?

9 Q When is the first time you heard about
10 the movie or saw it?

11 A The first time I heard about it is
12 when it came out.

13 Q When was that?

14 A The movie came out -- I'm not sure of
15 the exact year.

16 Q And did you see the movie when it came
17 out?

18 A No.

19 Q When did you first see the movie?

20 A I rented the movie, it was last year.

21 Q What did you hear about the movie
22 before renting it?

23 A I heard a few people mentioned that
24 they actually thought it was my book. They
25 thought the movie was my book.

1 ANTONNE M. JONES

2 A Like the period the book was written
3 in, the scenarios, the various scenarios within
4 the book.

5 Q Anything else?

6 A Nothing else I could recall right now,
7 this moment.

8 Q Overall essence is not a separate
9 category of similarities between the family and
10 State Property, right?

11 MR. DUNLOP: Objection to form.

12 A I'm not sure exactly how the term is,
13 but I'm looking at it -- the way I look at it is
14 all those together.

15 Q So it's plot, theme, dialogue, time
16 period and scenarios that you believe were
17 similar in The Family and State Property, right?

18 A Yes.

19 I can't recall anything at this moment
20 right now.

21 Q Take the theme of The Family, how
22 would you describe that?

23 A The theme? The theme would be about
24 four guys -- the theme would be -- I'm sorry.
25 The theme would be about young guys growing up

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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

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ANTONNE M. JONES,

:

Plaintiff, : Index No.

-against-

: 07 CV 3648

ROC-A-FELLA FILMS, INC.,

:

LION'S GATE FILMS, INC.,

:

DAMON DASH and SHAWN CARTER,

:

Defendants. :

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March 10, 2008

3:20 p.m.

Continued deposition of Plaintiff,
ANTONNE M. JONES, held at the law offices of
Cohen Tauber Spievack & Wagner LLP, The Graybar
Building, 420 Lexington Avenue, New York, New
York, before Susan B. Ratner, a Shorthand
Reporter and Notary Public within and for the
State of New York.

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BY: MARK A. TAMOSHUNAS, ESQ.

1 A. Jones

2 about the rules. I guess you know them already.

3 I just will remind you to allow me to
4 finish the question before you give your answer
5 so that the court reporter can take it down.

6 A. Sure.

7 Q. Please answer audibly and in words.
8 All right?

9 A. Yes.

10 Q. Of course, if there is any time you
11 want to take a break, just let me know and we
12 will accommodate you.

13 A. Sure.

14 Q. Did you ever see the movie "State
15 Property 2"?

16 A. Yes.

17 Q. Do you maintain that "State
18 Property 2" somehow infringes or is copied from
19 "The Family"?

20 MR. WOTORSON: Objection to form.

21 A. Could you repeat the question, please?

22 Q. Sure.

23 Do you maintain that "State Property
24 2" copies or takes the theme of "The Family," the
25 book that you wrote?

1 A. Jones

2 MR. WOTORSON: Objection to form.

3 A. Could you elaborate a little bit more
4 on that question?

5 I am not quite understanding it
6 exactly.

7 Q. Sure.

8 Do you maintain that "State Property
9 1" is copied from "The Family"?

10 A. Yes.

11 Q. Do you maintain that about "State
12 Property 2" as well?

13 A. I would say yes.

14 Q. In what way?

15 A. In a way that since it's a
16 continuation of part 1, yes.

17 Q. Is there anything specifically that is
18 in "State Property 2" that is also in
19 "The Family"?

20 MR. WOTORSON: Objection to form.

21 A. I can't recall at this moment.

22 Q. When you were watching "State Property
23 2," did you sense at that time that this was a
24 copy and somehow was copied from "The Family"?

25 A. I can't recall exactly at this moment.

1
2 **A N T O N N E M. J O N E S,**

3 called as a witness, having been first duly
4 sworn by the Notary Public (Susan B.
5 Ratner), stating his address as 2141 Route
6 38, Suite 414, Cherry Hill, New Jersey
7 08002, was examined and testified as
8 follows:

9 **EXAMINATION BY**

10 **MR. WAGNER:**

11 Q. Good afternoon, Mr. Jones. My name is
12 Steven Wagner.

13 It's nice to see you again.

14 A. Likewise.

15 Q. I am going to be asking you some
16 questions this afternoon. I hope to be started
17 and finished within the next two hours.

18 You are represented by two counsel
19 here today; is that right?

20 A. Yes.

21 Q. Mr. Wotorson, who is sitting next to
22 you, and Mr. Dunlop; is that right?

23 A. Yes.

24 Q. I know that you were deposed just a
25 few weeks ago, so I won't give you a long speech